

January 24, 2012

Reply to Attn of:

LS01 (PAW)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Blanket Approval to Attend Reception, Premiere of Hallmark Hall of Fame Movie "A Smile as Big as the Moon" and Stand-Up Dinner Sponsored By the Hallmark Hall of Fame

In accordance with 5 CFR § 2635.204(g)(2) and (3) and 14 C.F.R. 1207.103(c)(4), I make the following determination:

NASA invitees, accompanied by their spouse or a guest, may attend a reception, movie showing, and stand-up dinner sponsored by the Hallmark Hall of Fame at the 20th Century Fox Studio, 10201 W. Pico Boulevard, Los Angeles, California, on January 25, 2012. The reception begins at 6:15 p.m. and the movie showing is at 7:00 p.m., with a stand-up dinner immediately following. This event premieres the Hallmark Hall of Fame movie on Space Camp entitled "A Smile as Big as the Moon."


This event will be a widely-attended gathering of members of the Alabama Congressional Delegation and members of their staff, Alabama Governor Robert Bentley, the Director of the Alabama Tourism Department, members of the U.S. Space & Rocket Center's governing board, NASA employees, and Space Camp alumni who reside in the Los Angeles area. The reception and stand-up dinner are valued at \$20.00 to \$25.00 per person, and the cost of the movie showing at \$17.50 per person. Approximately 500 individuals have been invited to attend. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will help to raise NASA's profile with state and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its activities. Given the purpose of the event, the broad attendance anticipated, and the modest market value of this social event, I have determined that the value to the agency in having employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect the Hallmark Hall of Fame are not covered in this determination and should seek a specific determination from this office pursuant to 5 CFR § 2635.204(g)(3)(i) regarding their participation in this event.

The Hallmark Hall of Fame is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Patricia A. Watson at 256-544-0056.


for Audrey D. Robinson
Chief Counsel